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January 14, 2020

Via ECF

The Honorable Vernon S. Broderick, U.S.D.J.
United States District Court, S.D.N.Y.
40 Foley Square
New York, NY 10007

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 1/15/2020

Re: *Jimenez v. LX 1204 Jewelry Inc., et al.*
Case No. 19 CV 1908 (VSB)

The fact discovery deadline is extended to March 24, 2020, and the post-discovery conference is adjourned sine die. The parties are directed to submit a revised proposed Case Management Plan and Scheduling Order by January 23, 2020, at which point I will schedule the post-discovery conference.

Dear Judge Broderick:

We are counsel to Plaintiff in the above-referenced action and write, jointly with counsel to Defendants, to respectfully request (i) an extension of fact discovery to March 24, 2020, and (ii) an adjournment of the post-discovery conference scheduled for January 16, 2020 to a date following March 24, 2020.

Pursuant to the So Ordered Stipulation of Conditional Collective Certification at Dkt. 53 (entered on December 2, 2019), and the schedule set forth therein, on December 23, 2019, Plaintiff mailed the Court-approved conditional collective certification notice (the "Notice") to putative collective class members. The deadline for individuals to opt-in to the case is February 24, 2020. The parties have discussed participating in a settlement conference or mediation following the end of the opt-in period.

In view of pending collective certification mailing and to provide for sufficient time for opt-in claimants to join the case and participate in discovery and to accommodate a post-opt-in settlement conference or mediation, and further, as the parties have not yet conducted depositions, the parties respectfully request the aforementioned extension and adjournment.

This is the first request for adjournment of the conference, and the second request for the extension of fact discovery (although the previous request to extend discovery, at Dkt. 52, was never ruled on). Defendants' counsel consents and joins in the requests.

We thank the Court for its kind consideration.

Respectfully submitted,

/s/ Anne Seelig
Anne Seelig, Esq.

cc: all parties via ECF